



Yuba County Resource Conservation District
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February 18, 2010

Director Hydro Licensing, Power Generation
Pacific Gas and Electric Company
P.O. Box 770000

San Francisco, CA 94177
Chief, Division of Environmental Services
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

*Submitted via e-mail to hea@water.ca.gov
No Hard Copy Follows*

Re: Comments on Draft Habitat Expansion Plan for Central Valley Spring-Run Chinook
Salmon and California Central Valley Steelhead

Dear Licensees of FERC Project Nos. 1962, 2100, 2105, and 2107:

I am writing to you on behalf of the Yuba County Resource Conservation District. Our Board of Directors would like you to know that we support the HEA Central Valley Spring Chinook Salmon and Steelhead Draft for the Lower Yuba River for the following reasons.

1. The first of the three actions has been the subject of years of research and is ready for implementation. Yuba County Resource Conservation District (YCRCD) has lead the development of a site-specific proposal to remove the shot rock as the first step in rehabilitation, that was deemed appropriate based on the results of the U.C. Davis studies led by geomorphologist Greg Pasternack.
2. The estimated contribution to the Habitat Expansion Threshold (HET) for the Lower Yuba River Actions is the highest of all of the actions considered.
3. These actions appear to be the most cost effective, according to the draft HEP, and additional funding may also be made available, if necessary, from PG&E's Narrows Project mitigation fund, grants identified by the USFWS previously but then deemed premature, and/or grants administered by the Sierra Nevada Conservancy for which YCRCD has applied twice and been encouraged to re-apply (after the first application was deemed premature and the second

application was never considered due to the state budget crisis). The Licensees note that they propose to continue working with the signatories and active watershed groups who have been considering these actions for a number of years, including the YCRCD and other participants in the Lower Yuba River Technical Working Group (LYRTWG).

4. The YCRCD would be a willing landowner if the Stewardship Council were to select it as the recipient of the property upstream of lower Deer Creek, and would continue to support ongoing operations and maintenance of the site for habitat benefits.
5. The Lower Yuba River Actions could be implemented within a 5-year time frame, with a benefit to spring-run Chinook salmon realized within 10 years – when time, truly, is of the essence.
6. If the Three-Creeks Actions were selected, \$16.9 million would be earmarked for the \$46.3 million Phase 2 of the Battle Creek action, while the balance of necessary funding has not been identified and “Phase 2 will not be implemented unless and until funding is secured” – thus, a majority of the HEA funding could remain undisbursed for an indefinite period of time while the balance of funds are secured or another project is identified.

Our Resource Conservation District looks forward to working with you and your department in the future, if there is any further assistance we can offer please don't hesitate to contact me at the above email or phone, (530-639-9980)

Sincerely,

John Waskiewicz
Chair, Yuba County RCD Board of Directors